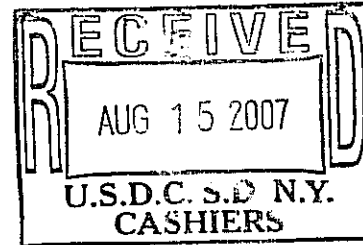


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07 CV 7306

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**



EDWARD PICKMAN,

Plaintiff,

**PLAINTIFF DEMANDS
A TRIAL BY JURY**

-against-

COMPLAINT

MILLER'S LAUNCH, INC.,

Defendant.

**SEAMAN'S CASE UNDER
THE JONES ACT FOR
PERSONAL INJURIES**

**SUITS UNDER SPECIAL RULE FOR SEAMEN TO
SUE WITHOUT SECURITY OR PREPAYMENT OF
FEES FOR THE ENFORCEMENT OF THE LAWS
OF THE UNITED STATES, COMMON AND STAT-
UTORY FOR THE PROTECTION OF AND FOR
THE HEALTH AND SAFETY OF SEAMEN AT SEA**

Plaintiff EDWARD PICKMAN, by his attorneys FRIEDMAN & JAMES LLP, complaining of the defendant MILLER'S LAUNCH, INC., respectfully alleges upon information and belief as follows:

FIRST COUNT

1. At all times hereinafter mentioned, defendant MILLER'S LAUNCH, INC. was and still is a corporation, or other business organization, organized and existing under and by virtue of the laws of one of the States of the United States of America, and doing business within this district.

2. At all times and dates hereinafter mentioned, defendant MILLER'S LAUNCH, INC. was the owner of the vessel NICHOLAS MILLER, and the launch barges, piers and docks at which said vessel was moored.

3. At all times and dates hereinafter mentioned, defendant MILLER'S LAUNCH, INC. operated the vessel NICHOLAS MILLER, and the launch barges, piers and docks at which said vessel was moored.

4. At all times and dates hereinafter mentioned, defendant MILLER'S LAUNCH, INC. managed the vessel NICHOLAS MILLER, and the launch barges, piers and docks at which said vessel was moored.

5. At all times and dates hereinafter mentioned, defendant MILLER'S LAUNCH, INC. controlled the vessel NICHOLAS MILLER, and the launch barges, piers and docks at which said vessel was moored.

6. At all times and dates hereinafter mentioned, the plaintiff was a member of the crew of the vessel NICHOLAS MILLER and an employee of defendant MILLER'S LAUNCH, INC.

7. On or about September 29, 2004, without any fault on the part of the plaintiff, and wholly and solely by reason of the negligence, carelessness and recklessness and of the defendant MILLER'S LAUNCH, INC., its agents, servants and/or employees, and by reason of the unseaworthiness of the vessel NICHOLAS MILLER, plaintiff was caused to sustain injuries.

8. As a result of the foregoing, the plaintiff was rendered sick, sore, lame and disabled and sustained severe permanent personal injuries, was and is internally and externally disabled causing him to suffer pain, and for a time he was

prevented from attending to his daily labors, thereby losing sums of money which he otherwise would have earned as wages, and has endeavored to be cured of his injuries, and has expended sums of money to maintain himself, and will continue to endure pain and suffering, all to his damage.

9. By reason of the foregoing, plaintiff has been damaged in the sum of ONE MILLION (\$1,000,000.00) DOLLARS.

SECOND COUNT

10. Plaintiff repeats and realleges each and every allegation of the First Count in this Complaint as if fully set forth at length herein.

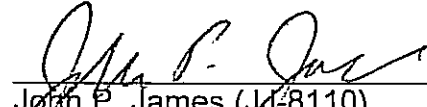
11. Plaintiff is entitled to maintenance, cure, and medical expenses for the period that he was disabled and unable to work in the total sum of ONE HUNDRED FIFTY THOUSAND (\$50,000.00) DOLLARS.

WHEREFORE, plaintiff EDWARD PICKMAN demands judgment against defendant MILLER'S LAUNCH, INC. in the First Count in the sum of ONE MILLION (\$1,000,000.00) DOLLARS; and in the Second Count in the sum of ONE HUNDRED FIFTY THOUSAND (\$150,000.00) DOLLARS; together with interest and costs.

Dated: New York, New York
August 15, 2007

FRIEDMAN & JAMES LLP
Attorneys for Plaintiff

By:


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